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*Counsel for the Debtor
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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

In re:

THE ROMAN CATHOLIC BISHOP OF
OAKLAND, a California corporation sole,

Debtor.

Case No. 23-40523 WJL

Chapter 11

**NOTICE OF OPPORTUNITY FOR
HEARING ON DEBTOR'S MOTION
UNDER 11 U.S.C. § 365 AND FED. R.
BANKR. P. 6006 TO REJECT EXECUTORY
CONTRACT WITH BLACKBAUD INC.**

Judge: Hon. William J. Lafferty

[No Hearing Required Unless Requested]

PLEASE TAKE NOTICE THAT on July 6, 2023, The Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor and debtor in possession (the "Debtor" or "RCBO") in the above-captioned chapter 11 bankruptcy case (the "Bankruptcy Case") filed the *Debtor's Motion Under 11 U.S.C. § 365 and Fed. R. Bankr. P. 6006 to Reject Executory Contract with Blackbaud Inc.* (the "Motion").

The Motion seeks an order under 11 U.S.C. §365 and Federal Rule of Bankruptcy Procedure 6006 approving rejection of that certain Solutions Agreement dated on or about April 29, 2021, to which the Debtor and Blackbaud Inc. are parties.

1 **PLEASE TAKE FURTHER NOTICE THAT** the Motion is filed pursuant to Bankruptcy Local
2 Rule 9014-1(b)(3)(A), which provides as follows:

- 3 i. Any objection to the requested relief, or a request for hearing on the matter, must be
4 filed and served upon the initiating party within 21 days of mailing the notice;
- 5 ii. Any objection or request for a hearing must be accompanied by any declarations or
6 memoranda of law any requesting party wishes to present in support of its position;
- 7 iii. If there is no timely objection to the requested relief or a request for hearing, the court
8 may enter an order granting the relief by default.
- 9 iv. In the event of a timely objection or request for hearing:

10 The initiating party will give at least seven days written notice of the hearing
11 to the objecting or requesting party, and to any trustee or committee appointed
12 in the case.

13 **PLEASE TAKE FURTHER NOTICE THAT** any objection to the Motion or request for hearing
14 on the Motion **must be filed and served not later than twenty-one (21) days after the date of this**
15 **notice.** Any objection and request for hearing must be filed in writing with Clerk of the Bankruptcy Court
16 at 1300 Clay Street, Suite 300, Oakland, California, 94612 (mailing address: P.O. Box 2070, Oakland,
17 California, 94604) and must be served on counsel for the Debtor at the address listed above.

18 **PLEASE TAKE FURTHER NOTICE THAT** that unless a timely objection or request for
19 hearing is filed, the Court may grant the relief requested in the Motion without a hearing, and that failure
20 to file and serve an objection or request for hearing may result waiver of any objection and entry of an
21 order granting the relief requested in the Motion by default.

22 DATED: July 6, 2023

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/s/ Shane J. Moses

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